

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOHN DOE	:	
	Plaintiff :	
v.	:	NO: 2:19-cv-01539-MAK
	:	
MITCHELL GARABEDIAN, ESQ., et al.	:	
	Defendants :	
	:	

PLAINTIFF'S MEMORANDUM
RE: PLAINTIFF'S USE OF A PSEUDONYM

Plaintiff, John Doe, by and through his counsel, The Beasley Firm, LLC, hereby files this Memorandum pursuant to this Court's 15 September 2021 Order (ECF #143) and avers as follows:

1. Plaintiff initiated this action under a pseudonym in April 2019 based on a reasonable fear of severe harm from litigating without a pseudonym. (ECF #1).
2. Plaintiff's interest and fear was reasonable based on the nature of the allegations in this lawsuit, the social climate at the time in which this suit was brought, and where Plaintiff is a private figure.
3. Despite Plaintiff's efforts to avoid any additional disclosure of his identity for the reasons above and in order to mitigate the already irreparable harm to his reputation caused by the Defendants' publications, certain actions by third-parties and the press, which occurred after the filing of this lawsuit, thwarted those efforts and Plaintiff's identity has not remained confidential.
4. Furthermore, Plaintiff recognizes the essential qualities of public proceedings and the important dimension of publicness to the issues in the lawsuit.
5. Accordingly, for the reasons set forth above, Plaintiff does not oppose (a) lifting of the seal of docket numbers 81, 82, 94, and 103 and does not oppose (b) the substitution of

Plaintiff's name for the current pseudonym or requiring the parties to identify the school to the extent necessary moving forward.

Respectfully submitted,

THE BEASLEY FIRM, LLC

BY: /s/ Lane R. Jubb, Jr.
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